IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

LaSHAN ARCENEAUX, Individually, and	§	Civil Action No.:4:17-cv-3234
as next friend of M.O., a minor,	§	
	§	
Plaintiffs,	§	
	§	
V.	§	JURY TRIAL
	§	
KLEIN INDEPENDENT SCHOOL DIST.,	§	
BRET CHAMPION, Individually,	§	
BRIAN GREENEY, Individually,	§	
THOMAS HENSLEY, Individually,	§	
KIMBERLY WALTERS, Individually,	§	
LANCE ALEXANDER, Individually,	§	
BENJIE ARNOLD, Individually,	§	
ANGIE RICHARD, Individually,	§	
STEPHEN NAETZKER, Individually,	§	
JENNIFER WALTON, Individually,	§	
·	§	
Defendants.	§	

JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

Plaintiffs LaShan Arceneaux, individually and as next friend of, M.O., and Defendants Klein Independent School District (KISD), Bret Champion, Brian Greeney, Thomas Hensley, Kimberly Walters, Lance Alexander, Benjie Arnold, Stephen Naetzker, Jennifer Walton, and Angie Richard (collectively the Parties) jointly file this Motion for Entry of Agreed Protective Order.

The Parties have agreed upon the form and substance of a protective order to govern the exchange of confidential information in this lawsuit. The Parties respectfully request that the Court enter the Agreed Protective Order attached hereto as a Proposed Order.

Respectfully submitted,

ROGERS, MORRIS & GROVER, L.L.P.

CLAY T. GROVER
State Bar No. 08550280
Fed. I.D. 15064
cgrover@rmgllp.com
JONATHAN G. BRUSH
State Bar No. 24045576
Fed. I.D. 619970
jbrush@rmgllp.com
5718 Westheimer, Suite 1200

Telephone: 713/960-6000 Facsimile: 713/960-6025

Houston, Texas 77057

ATTORNEYS FOR DEFENDANTS KISD, BRET CHAMPION, BRIAN GREENEY, THOMAS HENSLEY, KIMBERLY WALTERS, LANCE ALEXANDER, and JENNIFER WALTON

Respectfully submitted,

FANNING HARPER MARTINSON BRANDT & KUTCHIN, P.C.

/s/ Francisco J. Valenzuela by permission THOMAS P. BRANDT FRANCISCO J. VALENZUELA CAROLINE SILEO Fanning Harper Martinson Brandt & Kutchin, P.C. 4849 Greenville Ave., Suite 1300 Dallas, Texas 75206

ATTORNEYS FOR DEFENDANTS BENJIE ARNOLD, STEPHEN NAETZKER and ANGIE RICHARD Respectfully submitted,

KALLINEN LAW PLLC

/s/ Randall L. Kallinen by permission
Randall L. Kallinen
Kallinen Law PLLC
511 Broadway Street

Houston, Texas 77012

AMERICAN ATHEISTS LEGAL CENTER

/s/ Geoffrey T. Blackwell by permission Geoffrey T. Blackwell American Atheists Legal Center 1220 L. St. NW, Suite 100-313 Washington, DC 20005

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of November, 2018, a true and correct copy of the foregoing document was served on the following *via* electronic notification and certified mail, return receipt requested, and addressed as follows:

Randall L. Kallinen Kallinen Law PLLC 511 Broadway Street Houston, Texas 77012 (Attorney for Plaintiff)

Geoffrey T. Blackwell American Atheists Legal Center 1220 L. St. NW, Suite 100-313 Washington, DC 20005 (Attorney for Plaintiff)

Thomas P. Brandt
Francisco J. Valenzuela
Caroline Sileo
Fanning Harper Martinson Brandt & Kutchin, P.C.
Two Energy Square
4849 Greenville Ave., Suite 1300
Dallas, Texas 75206
(Attorneys for Defendants Benjie Arnold,
Stephen Naetzker and Angie Richard)

Attorney for Defendants KISD, Bret Champion, Brian Greeney, Thomas Hensley, Kimberly Walters, Lance Alexander, and Jennifer Walton